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Attorneys for Defendant
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HAYES P. HYDE IN
SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS MOTION TO
COMPEL DEPOSITIONS, OVERRULE
OBJECTIONS, COMPEL
INTERROGATORIES, AND COMPEL
SUPPLEMENTAL 30(B)(6) WITNESS
[DKT. 1789]**

Courtroom: 8
Judge: Hon. William Alsup
Trial: October 10, 2017

ACTIVE/92830147.1

**HYDE DECLARATION ISO WAYMO'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

CASE No. 3:17-CV-00939-WHA

I, Hayes P. Hyde, declare as follows:

1. I am an attorney at the law firm of Goodwin Procter, LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion to File under Seal Its Motion to Compel Depositions, Overrule Objections, Compel Interrogatories, and Compel Supplemental 30(b)(6) Witness [Dkt. 1789] and Exhibit 2 attached thereto.

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 2 to the Cooper declaration	Entire document

3. The entirety of Exhibit 2 includes highly confidential, sensitive business information relating to the terms and negotiation of Otto Trucking's agreements and its corporate structure. This information is not publicly known, and its confidentiality is strictly maintained. I understand that this information could be used by competitors to Otto Trucking's detriment, including in the context of negotiating business deals. If such information were made public, I understand Otto Trucking's competitive standing could be significantly harmed.

4. Defendant's request to seal is narrowly tailored to those portions of the Motion and Exhibit 2 that merit sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 29th day of September, 2017 in San Francisco, California.

/s/ Hayes P. Hyde
Hayes P. Hyde

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on September 29, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 29th day of September 2017.

/s/ Hayes P. Hyde
Hayes P. Hyde